

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

K.K. THROUGH HEATHER KINSINGER AND DAVID KINSINGER, AND HEATHER AND DAVID KINSINGER, Plaintiffs, v. FAYETTE COUNTY SCHOOL DIST., JONATHAN PATTERSON, ROSALIND GWIN AND ERINN ANGELO, Defendants	CIVIL ACTION FILE No.: 3:22-cv-00040-TCB Jury Demand
--	---

**JOINT CONSENT MOTION FOR THE COURT TO APPROVE A
SETTLEMENT CONTAINING CLAIMS OF A MINOR**

COME NOW all parties, jointly and with consent, and move the Court to lift the stay allowed for mediation, and to allow and approve the settlement as including a minor. See O.C.G.A. § 29-3-3 (2022). This is a multi-party action brought by Plaintiffs David Kinsinger and Heather Kinsinger on their own behalf and on behalf of their minor child K.K. After impartial mediation and arms-length negotiation, Plaintiffs and Defendants Fayette County School District, Jonathan Patterson, Rosalind Gwin and Erinn Angelo, have reached a full and complete settlement as to all claims. Defendants believe that Court approval under O.C.G.A. § 29-3-3 (2022) may be required, and all parties agree that the resolution of the

case including its alleged damages, reimbursement claims, costs and fees is fair and reasonable in light of the claims.

THEREFORE based on the record, the accompanying brief, the settlement documents and Agreement filed with the Court, the parties request the Court enter an order to allow the finalization of the Settlement Agreement, Joint Ex. 1, and that the parties may finalize such settlement, exchange the agreed upon consideration and dismiss this case with prejudice. A proposed Consent Order is filed with this motion, the accompanying brief and the putative settlement documents.

Respectfully submitted, this the 19th day of January 2023.

<p><u>s/Jonathan A. Zimring</u> Jonathan A. Zimring Georgia Bar No. 785250 Zimring Law Firm 1425A Dutch Valley Place Atlanta, Georgia 30324 (404)607-1600 (ext 7001) Zimring@zlawyers.com ATTORNEYS FOR PLAINTIFFS</p>	<p><u>/s/ Hieu M. Nguyen</u> Hieu M. Nguyen Georgia Bar No. 382526 HARBEN, HARTLEY & HAWKINS, LLP 340 Jesse Jewell Parkway, Suite 750 Gainesville, Georgia 30501 Telephone: (770) 534-7341 Facsimile: (770) 532-0399 Email: hnguyen@hhhlawyers.com ATTORNEYS FOR DEFENDANTS</p>
---	---

CERTIFICATE OF COMPLIANCE

COMES NOW Jonathan A. Zimring, counsel of record for Plaintiffs and states that this pleading is presented in Times New Roman, font 14, and complies with the rules of the Court.

By: Jonathan A. Zimring
Georgia Bar No. 785250

CERTIFICATE OF SERVICE

This is to certify that I have on this day served via email prior to filing the same and then through filing through the CM/ECF upon counsel for defendant.

Hieu M. Nguyen, ESQ.,
HARBEN, HARTLEY, & HAWKINS, LLP
Gainesville, Georgia 30501

DATED: This the 19th day of January 2023.

Respectfully submitted,
s/Jonathan A. Zimring
Jonathan A. Zimring
Georgia Bar No. 785250

Zimring Law Firm
1425A Dutch Valley Place
Atlanta, Georgia 30324
(404)607-1600 (ext 7001)
Zimring@zlawyers.com
Attorneys for Plaintiff